

### **REMARKS**

This application has been carefully reviewed in light of the Office Action mailed March 9, 2005. Claims 1-23 are pending in the Application. Applicant has amended Claims 1, 3 and 12. Applicant has cancelled Claim 17. Applicant has added new Claim 24. Reconsideration and favorable action is requested.

#### **Claim Objections:**

The Office Action rejects Claims 6 and 23 for informalities which Applicant has addressed by amendment. Favorable action is requested.

#### **Section 102 and 103 Rejections**

The Office Action states that Claims 1-3, 7-9 12-14, and 18-20 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,647,305 to Bigelow ("*Bigelow*"); the Office Action rejects Claims 4, 10, 15 and 21 under 35 U.S.C. § 103(a) as being unpatentable over *Bigelow* in view of U.S. Patent Application No. 2003/0001891 to Keohane et al. ("*Keohane*"); and Claims 5, 6, 11, 15, 16, 22 and 23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Bigelow* in view of U.S. Patent Application No. 2002/0026385 to McCloskey ("*McCloskey*") Applicant respectfully traverses these rejections for the reasons described below.

#### **Independent Claims 18 and 12**

Claim 18 is allowable at least because *Bigelow* does not disclose a knowledge base data set engine coupled to and operable to access various knowledge base data sets, the knowledge base data set engine operable to inferentially apply business process attributes to features within the digital model data set responsive to information linked to such features within the knowledge base data sets accessible to the knowledge base data set engine. The Office Action cites Column 7, lines 15-29 in rejecting this claim, but this portion does not disclose the claimed inferential application of business process attributes. Rather, it shows conditional relationships expressly defined between two objects, but not inferential application of business process attributes. For at least this reason Claim 18 is allowable, as are the claims depending therefrom. Independent Claim 12, as amended, is allowable for analogous reasons, as are the claims depending therefrom. Dependent Claim 7 is also allowable for analogous reasons. Reconsideration and favorable action are requested.

**Independent Claim 3**

Claim 3 has been written in independent form. Claim 3 is allowable at least because the cited references fail to show at least a business process attribute that comprises safety information defining a safety level parameter associated with a component represented in the digital model data set. No such safety level parameter is defined in *Bigelow*. Applicant's specification provides some examples of safety level parameters. Those examples include "critical," "major," and "minor." In rejecting Claim 3 the Office Action relies on Column 5 lines 64-67 of *Bigelow* stating "wherein properties corresponding to web objects which define properties of safety such as tolerance," but this portion of *Bigelow* does not show a business process attribute that comprises safety information defining a safety level parameter. It cannot be disputed that the information disclosed at this portion of *Bigelow*, such as height, length, width, surfaces, material composites, tolerances, etc. do not define safety level parameters, even if it is contended that this information relates to safety. Indeed, the definition of a safety level parameter is never mentioned in *Bigelow*. For at least this reason, Claim 3 is allowable. Reconsideration and favorable action are requested. It is noted that because Claim 3 was simply rewritten in independent form and has not changed in scope from its originally-filed state, that any new ground of rejection would have to be made in an Office Action that is not final.

**Independent Claim 1**

Claim 1 is allowable at least because the cited references do not teach or suggest quality information defining a quality level parameter associated with a component represented in the digital model data set; safety information defining a safety level parameter associated with a component represented in the digital model data set; revision information defining a revision parameter associated with a component represented in the digital model data set; and an information address attribute comprising a network address associated with information related to a component associated with data within the digital model data set.

Each of these limitations is not taught by the cited references, and for at least this reason Claim 1 is allowable. The safety level parameter limitation is not taught, as described above with reference to Claim 3.

For analogous reasons, *Bigelow* does not disclose a business process attribute comprising quality information defining a quality level parameter associated with a component represented in the digital model data set. *Bigelow* is devoid of any such use of a

quality level parameter. The Office Action relies on the same portion of *Bigelow* to teach a quality level parameter as it does to teach a safety level parameter (see Claim 3 above). But *Bigelow* fails to teach a business process attribute comprising quality information defining a quality level parameter. No quality level parameter is disclosed in *Bigelow*. The fact that certain parameters disclosed in *Bigelow* may relate to quality does not change the fact that no quality level parameter is defined in *Bigelow*.

The cited references also fail to show a business process attribute comprising information defining a vision parameter associated with a component represented in the digital model data set. The Office Action concedes that *Bigelow* does not teach this limitation and relies on *Keohane* to teach it, but that reliance is misplaced. *Keohane* simply shows the use of a revision number on a document, not a revision parameter associated with a component represented in the claimed digital model data set. Further, even if *Keohane* showed a revision parameter associated with a component represented in the claimed digital model data set, the motivation provided in the Office Action for combining these two references does not meet the evidentiary standard required by the M.P.E.P because it is merely a statement of one advantage described in Applicant's disclosure. The law is clear that the PTO cannot rely on Applicant's own disclosure for the required evidence of a motivation to combine references.

In addition, the cited references do not teach an information address attribute comprising a network address associated with information related to a component associated with data within the digital model data set. The Office Action concedes this limitation is not shown by *Bigelow* and relies on *McCloskey* to teach this limitation, but this reliance is misplaced. *McCloskey* does not show the claimed business process attribute comprising a network address associated with information related to a component associated with data within the digital model data set. Rather the cited portion of *McCloskey* merely shows the address of the file storing the displayed CAD drawing.

For at least these reasons, Claim 1 is allowable as are the claims depending therefrom. In addition, Claims 2, 4, 5, and 24 are each allowable for reasons described above with respect to their respective additional limitations. Reconsideration and favorable action are requested.

**CONCLUSION**

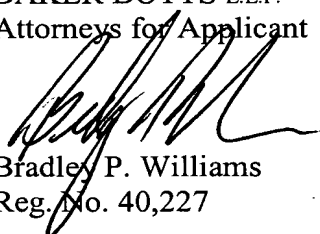
Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other apparent reasons, Applicant respectfully requests allowance of all pending claims.

If the Examiner feels that prosecution of the present Application may be advanced in any way by a telephone conference, the Examiner is invited to contact the undersigned attorney at 214-953-6447.

A check in the amount of \$200.00 is attached to cover fees due; however, the Commissioner is hereby authorized to charge any extra fee or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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